REMARKS

Status of Claims

The Office Action mailed June 16, 2005 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-9 were pending in the application. Since the claims have not been changed, claims 1-9 remain pending in the application.

A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Prior Art Rejections

In the Office Action, claims 1-4 and 6-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent 6,718,368 to Ayyadurai (hereafter "Ayyadurai") in view of U.S. patent 6,411,947 to Rice et al. (hereafter "Rice"), in further view of U.S. Patent Publication Application No. 2003/0208434 to Posner (hereafter "Posner"), in further view of Microsoft® Outlook 2000 (hereafter "Outlook"). Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Ayyadurai, in view of U.S. patent 6,651,217 to Kennedy et al. (hereafter "Kennedy"). Applicant respectfully traverses these rejections for at least the following reasons.

Each of the independent claims recite, *inter alia*, a method (or system/software) of processing an inbound document sent by a particular trading partner which (I) automatically determines a set of candidate reply transactions associated with the inbound document and the particular trading partner that sent the inbound document (II) without performing a language analysis of the content of the inbound document. These claimed features are supported in the specification, for example, at page 5, lines 25-30. At least these recited features are not disclosed or suggested by the applied prior art for at least the following reasons.

First, as acknowledged in the office action, Ayyadurai (the primary reference) does not disclose feature (II) recited in each of the independent claims. To cure this deficiency, the office action relies on Rice. However, Rice also does not disclose automatically determining a set of candidate reply transactions (associated with the inbound document and a particular

trading partner) without performing a language analysis of the content of the inbound document.

Rice discloses that its automatic message reader 30 uses an AI reasoning component that "emulates the recursive nature of human interpretation by first detecting the combinations of prominent words (or text) and patterns of text *within* an electronic message 11 using a character matcher..." *See* col. 4, lines 20-40 of Rice (Emphasis added). That is, Rice discloses that its automatic message reader 30 performs a language analysis (of patterns of text or even their absence thereof) within the content of the electronic message (which the examiner equates to the claimed inbound document). The cited portions in the office action (col. 5, lines 54-56 and col. 6, lines 4-6 and 29-32) merely disclose rule based processing after the automated message reader 30 has first detected the text and patterns of text within the electronic message. It should be noted selective citations that that ignore the earlier processing by Rice is improper since it would impermissibly change the principle of operation of the Rice invention.

Since the deficiencies in Ayyadurai and Rice are not cured by any of the other applied references, the applied references fail to make a case of *prima facie* obviousness with respect to the pending independent claims 1, 8, and 9.

Second, the independent claims recite feature (I) which is also not disclosed or suggested by the applied prior art. Specifically, the office action acknowledges that the combination of Ayyadurai and Rice does not disclose automatically determining a set of *candidate reply* transactions associated with the inbound document and the particular trading partner that sent the inbound document. With respect to this claimed feature, the office action cites to Outlook disclosing "displaying a link to each attachment candidate document of an attachment set adjacent to a header of inbound document in a screen of a mailbox for the user...." However, this does not disclose a set of candidate *reply* transactions *associated with a particular trading partner* and only discloses a generic set of attachments which the user can select from. Accordingly, this recited feature is also not disclosed or suggested by the applied prior art and provides an additional reason for the patentability of the pending independent claims.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional reasons for their patentability when considered as a whole.

Conclusion

In view of the above, applicant believes that the present application is now in condition for allowance. An early notice of the same is respectfully solicited. The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicant hereby petitions for any needed extension of time.

Respectfully submitted,

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